

EXHIBIT C

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT WEST VIRGINIA
2 CHARLESTON DIVISION
3) Master File
IN RE: ETHICON, INC.,) No. 2:12-MD-02327
4 PELVIC REPAIR SYSTEM) MDL No. 2327
PRODUCTS LIABILITY)
5 LITIGATION) JOSEPH R. GOODWIN
_____) U.S. DISTRICT JUDGE
6) _____
THIS DOCUMENT RELATES TO)
7 PLAINTIFFS:)
)
8 Donna Bihlmeyer, et al v.)
Ethicon, Inc., et al)
9)
Case No. 2:12-cv-02159)

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11 *****
12 VIDEO DEPOSITION OF
13 CHRISTINA KLEIN PRAMUDJI, M.D.
14 June 9, 2016
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<p style="text-align: right;">Page 94</p> <p>1 scarring that led to the vaginal stenosis. Was that 2 scarring worse in the native tissue arm than the 3 Prolift arm? 4 A. Yes, it was. 5 MR. DARLEY: Object to form. Burt, can 6 we ask some non-leading questions here? I think that 7 would be appropriate. 8 Q. (By Mr. Snell) Plaintiff's counsel asked you 9 some questions about the early Prolift IFU. Do you 10 recollect that? 11 A. Yes. 12 Q. And I believe you testified it was your 13 opinion that this IFU was adequate? 14 A. Yes. 15 Q. And you identified to Plaintiff's counsel 16 that the IFU points to things like infection, 17 adhesions, scarring -- 18 MR. DARLEY: Object to form. 19 Q. (By Mr. Snell) -- and contraction. Is that 20 correct or not? 21 A. Yes, that's what I -- that's what I pointed 22 to. 23 Q. And why is it your opinion that a pelvic 24 floor surgeon would understand that dyspareunia could</p>	<p style="text-align: right;">Page 96</p> <p>1 Q. And what is the significance, if any, of that 2 study? 3 MR. DARLEY: Object to outside the scope 4 of direct. 5 A. This study shows that, going back over 50 6 years, that pelvic floor surgeons are aware that 7 dyspareunia -- and I'm reading from the study -- are 8 well accepted complications of operations which 9 involve incision and suture of the vagina, that there 10 is tenderness of scars in the vaginal walls, 11 shortening of the vagina, especially following vaginal 12 hysterectomy is an important factor, but the most 13 important cause -- obvious cause is narrowing of the 14 introitus and the vagina, which results from removal 15 of tissue as part of the cure of prolapse. 16 Q. (By Mr. Snell) And does this study support 17 your opinion with regard to the adequacy of the IFU 18 for Prolift? 19 A. Yes, this shows that this is part of the 20 common knowledge and literature of pelvic floor 21 surgery, vaginal surgery. 22 Q. And you -- I believe you mentioned in 23 response to Plaintiff's counsel's questions, you 24 mentioned the surgeon's monograph. Did I hear you</p>
<p style="text-align: right;">Page 95</p> <p>1 flow from any of those complications? 2 A. Because we are trained to know that scarring 3 in the vagina and inflammation in the vagina will or 4 can, it may not, but it can cause dyspareunia. So 5 that is something that is a fundamental part of 6 training to pelvic floor surgeons. 7 Q. Is that -- do you know whether or not the 8 potential risk of dyspareunia from Prolift surgery, 9 whether or not that was something that was commonly 10 known in your field before Prolift came out in 2005? 11 MR. DARLEY: Object to form. 12 A. Yes, that was commonly known to occur just 13 with the most fundamental surgery, such as an anterior 14 and posterior repair or a hysterectomy, which can be a 15 form of reconstruction if they have prolapse. 16 Q. (By Mr. Snell) And in your general report 17 and in your materials list, do you point to any of the 18 medical literature that supports that opinion? 19 A. Yes. 20 Q. I'd like to hand you a paper from one of the 21 boxes. Can you identify this for the record? 22 A. Yes. This is a study dating back to 1961. 23 The first author is Winifred Francis and the title of 24 the study is Dyspareunia Following Vaginal Operations.</p>	<p style="text-align: right;">Page 97</p> <p>1 correctly? 2 A. Yes, I did. 3 Q. Well, let me ask you this: Is the surgeon's 4 monograph part of professional education for Prolift? 5 A. Yes, it is. 6 Q. How do you know that? 7 A. Well, I was -- I did professional education 8 for Ethicon for many years, so I'm familiar with the 9 -- what was supplied during the education sessions, 10 the monograph, IFU, the slide presentations that were 11 -- that were given, because I was directly involved in 12 educating other surgeons. 13 Q. Did you do any professional education on 14 Prolift? 15 A. Oh, yes, I did, quite a bit. 16 Q. During your professional education of the 17 Ethicon devices, did you cover the instructions for 18 use? 19 A. Yes. 20 Q. And is that a form -- strike that. 21 Is that part of the foundation of your 22 opinions about the adequacy of the IFU? 23 A. Yes. 24 Q. And if you look at the very first page of the</p>

<p style="text-align: right;">Page 98</p> <p>1 Prolift IFU that Plaintiff's counsel asked you about, 2 it says: Training on the use of Gynecare Prolift 3 Pelvic Floor Repair Systems is recommended and 4 available. 5 Do you see that? 6 A. Yes. 7 Q. And would a pelvic floor surgeon going to the 8 Prolift professional education be informed about risk 9 of scarring, pain and dyspareunia, among others? 10 MR. DARLEY: Object to form. 11 A. Yes, we would definitely educate the other 12 physicians about that. 13 Q. (By Mr. Snell) And what is the basis of that 14 statement? 15 A. That's based on my experience and also just 16 going back and reviewing the slide presentations and 17 the monograph and everything that was provided to the 18 surgeons. 19 Q. I'm going to hand you the Prolift monograph 20 that I believe you referenced. Can you tell us 21 whether that -- whether or not the Prolift monograph 22 supports your opinion that the IFU is adequate? 23 MR. DARLEY: Object to form. Leading. 24 A. Yes, it --</p>	<p style="text-align: right;">Page 100</p> <p>1 counsel that you would like to do an IME since 2 Dr. Galloway was afforded that opportunity last week? 3 A. Yes, I believe I provided dates two or three 4 weeks ago to open up for an IME, but she was not made 5 available for that. I would still like that 6 opportunity. 7 MR. DARLEY: Object to form. Move to 8 strike that. Go ahead, Burt. 9 MR. SNELL: Now, I don't -- Counsel, you 10 can correct me if I'm wrong, but I don't believe 11 Dr. Galloway has been deposed yet or maybe he's being 12 deposed pretty soon. 13 MR. DARLEY: I think today, actually. 14 MR. SNELL: Okay. 15 Q. (By Mr. Snell) Dr. Pramudji, do you intend 16 to review and comment about Dr. Galloway's deposition 17 testimony, if at all? 18 A. Yes. 19 Q. Okay. Given the data cited in your report at 20 Page 6 and 7 and the randomized control trials you've 21 referenced, are you able to rule out the mesh as being 22 a cause of her dyspareunia and pelvic pain? 23 A. Yes. 24 MR. DARLEY: Object to form.</p>
<p style="text-align: right;">Page 99</p> <p>1 MR. SNELL: Well, it's a whether or not, 2 so it's one way or the other. 3 Q. (By Mr. Snell) Go ahead. 4 A. Yes, it does support my opinion. 5 Q. Can you tell us why, if at all? 6 A. Yes. The monograph goes into great detail in 7 the risks of dyspareunia and vaginal pain with the 8 Prolift System. It has almost a full page of 9 information regarding that provided to the surgeons. 10 It has a graph and it has literature articles to cite 11 back to if the surgeons wanted more information. 12 Q. You were asked some questions about 13 Dr. Galloway's recent IME of the Plaintiff. Do you 14 recollect that? 15 A. Yes. 16 Q. Do you have an understanding as to when 17 Dr. Galloway did his IME? 18 A. Yes. It was last week, June 3rd, 2016. 19 Q. Do you put much weight on Dr. Galloway's IME 20 considering what -- considering his inability to do an 21 adequate exam that you mentioned on numerous 22 occasions? 23 A. No, I don't. 24 Q. And I think you made it clear to Plaintiff's</p>	<p style="text-align: right;">Page 101</p> <p>1 Q. (By Mr. Snell) What do you believe to be the 2 cause of her pelvic pain and dyspareunia? 3 MR. DARLEY: Object to form. 4 A. I believe that her pelvic pain and 5 dyspareunia is due to scarring from the hysterectomy 6 and the pelvic floor reconstruction and in recent 7 months or years is due to the vaginal atrophy that she 8 has developed over the last few years. 9 Q. (By Mr. Snell) And for the vaginal atrophy 10 that you mentioned, is that a treatable condition? 11 A. Yes, it is. 12 Q. How, if at all, would you recommend 13 Mrs. Bihlmeyer consider treating the atrophy? 14 A. I would recommend that she use either a 15 vaginal cream, like Premarin cream or Estrace cream, 16 she could use a vaginal tablet, such as Vagifem or she 17 could use Osphena, which is an oral tablet. And any 18 of those treatments would improve her vaginal wall 19 health and the sensations would improve. 20 MR. SNELL: That's all I have. Thank 21 you. 22 EXAMINATION 23 QUESTIONS BY MR. DARLEY: 24 Q. Dr. Pramudji, I've just got a couple more</p>

Christina Klein Pramudji, M.D.

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1 I, CHRISTINA KLEIN PRAMUDJI, M.D, have read the
2 foregoing deposition and hereby affix my signature
3 that same is true and correct, except as noted above.
4
5

CHRISTINA KLEIN PRAMUDJI, M.D

6
7 THE STATE OF _____
8 COUNTY OF _____

9 Before me, _____, on this
10 day personally appeared CHRISTINA KLEIN PRAMUDJI, M.D,
11 known to me (or proved to me under oath or through
12 _____) (description of identity
13 card or other document) to be the person whose name is
14 subscribed to the foregoing instrument and
15 acknowledged to me that they executed the same for the
16 purposes and consideration therein expressed.

17 Given under my hand and seal of office this
18 _____ day of _____,
19 _____.

NOTARY PUBLIC IN AND FOR

18 THE STATE OF _____
19 COMMISSION EXPIRES: _____
20
21
22
23
24

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1 THE STATE OF TEXAS:
2 COUNTY OF FT. BEND:

3 I, Tamara Vinson, a Certified Shorthand
4 Reporter and Notary Public in and for the State of
5 Texas, do hereby certify that the facts as stated by
6 me in the caption hereto are true; that the above and
7 foregoing answers of the witness, CHRISTINA KLEIN
8 PRAMUDJI, M.D., to the interrogatories as indicated were
9 made before me by the said witness after being first duly
10 sworn to testify the truth, and same were reduced to
11 typewriting under my direction; that the above and
12 foregoing deposition as set forth in typewriting is a
13 full, true, and correct transcript of the proceedings
14 had at the time of taking of said deposition.

15 I further certify that I am not, in any
16 capacity, a regular employee of the party in whose
17 behalf this deposition is taken, nor in the regular
18 employ of his attorney; and I certify that I am not
19 interested in the cause, nor of kin or counsel to
20 either of the parties.

21 GIVEN UNDER MY HAND AND SEAL OF OFFICE, on
22 this, the ____ day of June, 2016.
23
24

Tamara Vinson, Texas CSR No. 3015
Expiration Date: 12-31-2016

20 GOLKOW TECHNOLOGIES, INC.
21 Texas CRCB Registration #690
22 440 Louisiana, Suite 910
23 Houston, Texas 77002
24 www.golkow.com